

broad, burdensome, harassing, excessive in scope and time and incorrectly implying that its products were a health hazard.

INTERROGATORY NO. 30:

Identify any and all persons or entities, other than the employees listed above, including, but not limited to insurance carriers and/or related companies, which provided services, information, consulting and/or advice to defendant and/or any predecessor/related entity, at any time from 1940 to date, relating to any and/or all of the following:

- (a) Occupational health and/or safety;
- (b) Federal, state and/or local safety regulations (including, but limited to OSHA);
- (c) Federal, state and/or local environmental regulations;
- (d) Federal, state and/or local health regulations (including, but limited to OSHA);
- (e) Industrial hygiene;
- (f) Insurance or risk management;
- (g) Workers compensation;
- (h) Medical matters; and,
- (h) Asbestos abatement.

ANSWER: - Gleason objects to this Interrogatory as overly broad, burdensome, harassing, excessive in scope and time and incorrectly implying that its products were a health hazard.

INTERROGATORY NO. 31:

Did defendant and/or any predecessor/related entity, or any medical department or industrial hygiene division thereof, maintain a medical and/or scientific library at any time from 1940 to the present? If so: